



American Public Power Association

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April 29, 2005

The Honorable Karen A. Harbert
Assistant Secretary for Policy And International Affairs
U.S. Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

Dear Assistant Secretary Harbert:

The American Public Power Association (APPA) requests, at a minimum, a 30-day extension of the public comment period for the General Guidelines for the "Voluntary Reporting of Greenhouse Gases Program," together with the notice of availability of the related draft Technical Guidelines, published in the March 24, 2005, *Federal Register*. Currently the period afforded by the notice for submission of written comments by stakeholders and other members of the public is May 23, 2005.

APPA is the national service organization representing the interests of the nation's more than 2,000 community-owned electric utilities that serve over 43 million Americans. The utilities include state public power agencies, municipal electric utilities, and special utility districts that provide electricity and other services to some of the nation's largest cities such as Los Angeles, Seattle, San Antonio, and Jacksonville. However, the vast majority of these utilities serve small and medium-sized communities in 49 states, all but Hawaii. In fact, 75 percent of publicly-owned electric utilities are located in communities with populations of 10,000 people or less.

APPA views an improved Section 1605(b) reporting system as an important component of our overall greenhouse gas emissions reduction activities. Public power members are very interested in ensuring that the reporting mechanism offers a credible but user-friendly system to record results. As we stated in our February 17, 2004 comments to DOE, we want a system that provides ease of use for current and future reporters.

Upon our review of the "Section by Section Discussion of the General Guidelines (*id.* At 15177-81), it is clear that DOE has made a significant number of revisions to the original 2003 proposal. For example, Section 300.6 on emission inventories includes important modifications as does Section 300.8 on calculating emission reductions.

In addition, while the draft Technical Guidelines and Glossary will not be included in the *Code of Federal Regulations*, they will form an integral part of the Section 1605(b) procedures for the voluntary reporting of greenhouse gas emission reports to DOE. According to DOE, the Technical Guidelines are to provide "further guidance on the interpretation and application" of the General Guidelines. The 285 pages of the draft Technical Guidelines and Glossary will prove extremely important to our members as they determine whether or not to use Section 1605(b) reporting under the Power Partners MOU, and they deserve our full attention.

Together, the General Guidelines and Technical Guidelines include important changes that require additional review. APPA and its members have participated in several briefings sponsored by DOE to discuss issues and to ask relevant questions as we prepare our comments. These briefings exposed many questions and concerns about reporting,

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registering and accounting procedures that will require further clarification. In our view, there will not be enough time to fully vet and prepare recommendations by the comment period deadline.

In the public power sector, we remain concerned that the breadth and scope of reporting and registration requirements will hinder wide participation of our members. We want to continue to develop reporting alternatives and solutions to help reduce the cost and complexity of reporting for our small and medium-sized systems lacking resources to follow arduous requirements. We are also concerned about the issue of how our wholesale and joint action agency members will be able to report or register activities. We are reviewing the provisions involving reporting requirements for indirect emissions from purchased power and the requirement to estimate excluded emissions as part of initial inventories to determine the impact on the joint action agencies' ability to report or register on behalf of their consumer members. There are 72 joint action agencies with 1,126 public power members collectively serving the electricity needs of approximately 21 million people.

An extension of the comment period by at least 30 days will help the public power sector consider and propose solutions to the problems cited above. It will be in all of our best interests to give potential reporters sufficient time to comment on the voluminous set of General and Technical Guidelines.

Thank you for your consideration.

Sincerely,



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American Public Power Association

RB/JJN/*GFT*

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